

ATTACHMENT A TO PLEA AGREEMENT: U.S. v. SEIFERT, 22-CR-193

On September 1, 2022, the Kewaunee County Sheriff's Department ("KCSO") responded to the rural residence of Adult-1 and her husband, Adult-2. Adult-1 reported that on August 29, 2022, she found her 17-year-old daughter, JV-1 (dob 2005), completely nude in JV-1's bedroom masturbating with a hairbrush during a live, online video with an older male later identified as the defendant, Stanley J. Seifert III. Adult-1 grabbed JV-1's phone, looked at the unknown male's face, and yelled "who the fuck are you?" Adult-2 (JV-1's stepfather) ran into the room and saw the male's face before the video disconnected. JV-1's phone (a Samsung Galaxy S20) contained a saved screenshot of the male, whom Adult-1 and Adult-2 identified as the same male who was video chatting with JV-1. JV-1 provided officers with Seifert's name, and they obtained his WI Driver's License photo, issued on July 25, 2022. When comparing it to the screenshot, they positively identified Seifert as the online male.

Investigators with KCSO and the Internet Crimes Against Children Task Force, including members of the Brown County Sheriff's Department ("BCSO"), interviewed JV-1 about Seifert. JV-1 said that she met Seifert online about two years ago, when she was 15, while playing the virtual game "Among Us." She thought he was from West Virginia, worked in construction, and was currently in a hotel near Detroit, Michigan. JV-1 provided Seifert's picture, his phone number of 703-XXX-7255, his sister's names, his dog's name, and the type and color of his Jeep vehicle. She said that on Monday, August 29, 2022, around 8:30pm, she and Seifert were video chatting online in her bedroom when Seifert asked her to get naked, which she did. JV-1 masturbated with a hairbrush, inserting it into her vagina for about five minutes when her mother walked in.

JV-1 and Seifert communicated using cell phones throughout their online relationship, but when JV-1's phone was taken away by her parents in early 2022 for failing grades, Seifert bought her a new AT&T-enabled Samsung Galaxy S20 cell phone, GSM_SM-G781U, number 920-XXX-3200. Seifert activated the phone's parental-control features and used them to monitor and restrict JV-1's use. He told JV-1 to use only the S20 phone to communicate with him, and if she was caught speaking with him, she should remove the SIM card, wipe the phone's data, and tell her parents that he was "Chris" from "Minnesota." Seifert sent JV-1 several gifts, including coloring books and colored pencils, which arrived at her house under the name "Rose Oakley" in case her family saw or opened the packages.

During their numerous live, online video sessions using cell phones, Seifert directed JV-1 to show him her breasts and vaginal area, and to perform sexual acts like masturbation for him. Seifert threatened that if she didn't do what he requested, he would take away apps on the phone, never see her again.

JV-1 did not initially disclose that she had met Seifert in person. But on August 4, 2022, a nearby landowner's trail camera had captured pictures of Seifert's silver and black Jeep entering the driveway of a secluded, wooded property not far from JV-1's residence. The landowners were not there, but the caretaker reported the suspicious activity to KCSO. The images showed Seifert's Jeep on the property the evening of July 9, and the mornings of July 11, July 25, and July 29, 2022.

On September 9, 2022, investigators re-interviewed JV-1. JV-1 repeated having met Seifert online when she was 15 using the game/application “Among Us.” They subsequently communicated in another app called Discord. JV-1 assumed Seifert was a teenager like her until they had an online video chat and she saw that he was a 40-year-old man. Over the internet, Seifert sent her pictures of his penis and asked her to send him pictures of herself naked. She resisted, but he threatened to tell her parents that they were communicating. She relented and—when she was 15—sent Seifert about five pictures of her nude breasts and vaginal area. They continued to engage in live, online video chats when she was 15, 16, and 17 years’ old, during which—at least once per week—she got naked and performed sexual acts. Among the gifts that Seifert sent her—addressed to “Oakley Rose”—were “sexy lingerie and underwear” he told her to wear during video chats in which he masturbated. JV-1 initially used two Motorola Moto cell phones and a Samsung A42 cell phone that she got from her parents. JV-1 said that Seifert knew she was a minor because around her 16th birthday—the summer of 2021—he asked if she was going to get her driver’s license.

In early 2022, JV-1’s grades were failing so her parents took away her phone. She secretly used her stepfather’s Chrome Book to keep communicating with Seifert. Subsequently, Seifert obtained a Galaxy S20 phone for JV-1. It was the same phone that JV-1 was using during the live video chat on August 29, 2022, which her mother interrupted. The S20 came pre-configured with applications, passwords, and parental controls. Using the S20, JV-1 and Seifert engaged in weekly video chats where she performed sexual acts on herself, including instances where she took showers and used a vibrator, which he could control remotely online. Seifert told JV-1 that he wanted to meet her, get her pregnant, and when she turned 18—live together. In June 2022, Seifert told JV-1 that he was moving to Wisconsin. JV-1 knew that Seifert got an apartment near Green Bay because she had access to his Amazon account and sent him a toy for his dog.

JV-1 said that in the summer of 2022, just before her 17th birthday, Seifert picked her up near her Kewaunee County home after her parents had left for work. They drove to a nearby property, where they had sexual intercourse inside and outside Seifert’s Jeep. Seifert did not wear a condom and ejaculated on the ground next to the Jeep. JV-1 said they met and had sex three more times in much the same way. Seifert often used his cell phone to record them having sex, and he later showed her the recorded videos when they engaged in online video chats. They had vaginal and oral sex, and Seifert dropped her off when they were done. They did not have sex in August 2022 because Seifert was traveling for work.

After JV-1’s parents interrupted the August 29th online video with Seifert, they took away her electronic devices. She again resorted to using her stepfather’s Chromebook to keep communicating with Seifert, who told her to get the S20 back, pull the SIM card, and factory reset the phone.

On September 9, 2022, investigators conducted a forensic examination of the Samsung Galaxy S20 phone that Seifert gave to JV-1. The phone and its packaging, which was found during a search warrant at Seifert’s Green Bay-area apartment, indicates that it was manufactured in Vietnam. The phone had parental controls enabled, just as JV-1 had indicated to officers and Seifert—in the recovered chat messages—had repeatedly reminded and warned JV-1. Seifert was

stored in JV-1's contacts under "Honey," which included his picture and telephone number of 703-XXX-7255.

The S20 phone contained numerous chat messages between Seifert and JV-1 that took place during their live, online video sessions. The messages include numerous back-and-forth discussions and image-sharing of sexually explicit conduct that they wanted to perform and had already performed on each other. More than once, Seifert told JV-1 that he enjoyed the idea of inflicting pain on her during sexual activity, and that he wanted to push beyond her pain threshold, hoping she would not use their "safeword" of "Pomodoro." Embedded in many of their chat messages are sexually graphic images showing males and females of varying ages, some involving bondage and masochism, using vaginal-insertion and clamping devices.

The S20 phone also contains numerous chats and images during a work-related trip that Seifert took from Green Bay to Michigan via the SS Badger Car Ferry. During the trip, including when Seifert was aboard the ferry, he and JV-1 communicated through text message and live, online video. While on the four-hour ferry ride, Seifert told her they were going to play a "game" of "strip poker" whereby she was to send him pictures, every 30 minutes, showing her with less clothing each time. During this exchange and others, Seifert repeatedly called JV-1 his "Little One" and told her to "obey [her] Daddy." JV-1 complied by sending (i) a first picture wearing a top (like a sports bra) and underwear, (ii) a second picture without the bra showing her breasts, and (iii) a third picture of her vaginal area without underwear and with the bra pulled up exposing her breasts (partial file: 20220807_152704.jpg).

On September 8, 2022, the Kewaunee County District Attorney obtained an extradition warrant for Seifert on felony charges related to exposing a child to harmful material and exposing genitals/pubic area/intimate parts to a child. Seifert was arrested the same day by Michigan State Police ("MSP") in Novi, Michigan.

After being advised of and waiving his *Miranda* rights, Seifert told MSP the following: he shouldn't have been talking to JV-1, who he has known for a couple of years and knows that she's 17 years' old; they are "friends" but "pretend to be in a relationship"; they communicated by phone through messaging and video chats; he provided her with a cell phone; he has seen JV-1 naked on video chats a couple times per month, during which JV-1 would masturbate sometimes at his request; he did not send her naked pictures of himself and was clothed during their video chats; their relationship did not get sexual until a couple months ago, but when asked if anything on his devices would refute that, he said "it shouldn't"; after initially denying having met JV-1 in person, he admitted that they did, and that he went to her home and dropped off gifts, including coloring books and markers; this was the first time he had a friendship with an underage girl, and he only did so because he was unable to attract women his own age; it was all consensual, but when asked if what he did was "wrong," he said "100%"; he knew better but did it anyway; and "God, this fucking ruined my whole life."

On September 8, 2022, investigators executed a search warrant at Seifert's Ashwaubenon apartment. They recovered an empty cell phone box for the same Galaxy S20, made in Vietnam, that officers obtained from JV-1. Officers also found a receipt showing the S20 was bought at AT&T in Green Bay on July 28, 2022, by customer "Stanley S" whose phone number was 703-

XXX-7255. Officers also recovered from Seifert's apartment his Virginia driver's license and license plates; a device labeled "Vaginal Pump," an "S.M." player stimulator; two nipple clamps with chains; three adjustable clamps with chains; leather bondage straps with adjustable nipple clamps; a leather paddle; women's thongs, underwear, and lingerie.